

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CAUSE NO. 4:17-CR-9
	§	Judge Crone
THEODORE WILLIAM TAYLOR (1)	§	
CHIA JEAN LEE (2)	§	

GOVERNMENT'S EXHIBIT LIST

NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
1	Susannah Herkert / Business Records Affidavit	Taylor clinic patient files			
2	Susannah Herkert	Select redacted Taylor clinic patient files			
3	Susannah Herkert / Business Records Affidavit	Taylor clinic Bookkeeping records			
4	Susannah Herkert / Business Records Affidavit	Taylor clinic Appointment Status Reports			
5	Susannah Herkert	Controlled substance schedules graphic			
6	Susannah Herkert	Indicted controlled substances graphic			
7	Susannah Herkert	Investigative red flags graphic			
8	Susannah Herkert	Summary chart of voluminous Prescription Monitoring Program records			
9	Susannah Herkert	Summary chart of voluminous Prescription Monitoring Program records			
10	Susannah Herkert	Summary chart of voluminous Prescription Monitoring Program records			
11	Susannah Herkert	Summary chart of voluminous Prescription Monitoring Program records			
12	Susannah Herkert	Summary chart of voluminous Prescription Monitoring Program records			
13		RESERVED			
14	Susannah Herkert	Summary chart of Taylor clinic patient files – positive drug tests			
15	Susannah Herkert	Taylor clinic fee schedule			
16	Susannah Herkert	Summary chart of voluminous Prescription Monitoring Program records			
17	Susannah Herkert	Patient warning letters and related documents from Taylor clinic patient files			
18	Susannah Herkert	Rules on Pain Medicine from Taylor clinic			

19	Susannah Herkert	Notice on Codeine Cough Syrup from Taylor clinic			
20	Susannah Herkert	Drug treatment contract from Taylor clinic			
21	Susannah Herkert	Warning to Opiate and Benzodiazepine patients from Taylor clinic			
22	Susannah Herkert	Correspondence from Theodore W. Taylor			
23	Susannah Herkert	Correspondence from Theodore W. Taylor			
24	Susannah Herkert	Correspondence from Theodore W. Taylor			
25	Susannah Herkert	Correspondence from Theodore W. Taylor and related patient file documents			
26	Susannah Herkert	Correspondence from Theodore W. Taylor			
27	Susannah Herkert	Correspondence from Richardson Hospital Authority to Theodore W. Taylor			
28	Susannah Herkert	Correspondence from Theodore W. Taylor to Richardson Hospital Authority			
29	Susannah Herkert / Business Records Affidavit / Patrick Knue	Prescription Drug Monitoring Program records for Theodore W. Taylor			
30	Michelle Murawsky	Correspondence to Theodore W. Taylor			
31	Nick Bristow	Recording of Sept. 23, 2011, undercover meeting			
32	Nick Bristow	Transcript of Exhibit 30			
33	Nick Bristow	Excerpts from Exhibit 30			
34	Nick Bristow	Sept. 23, 2011, prescription for controlled substances			
35	Nick Bristow	Sept. 23, 2011, Taylor clinic receipt			
36	Nick Bristow	Recording of Oct. 26, 2011, undercover meeting			
37	Nick Bristow	Transcript of Exhibit 36			
38	Nick Bristow	Excerpts from Exhibit 36			
39	Nick Bristow	Oct. 26, 2011, Taylor clinic receipt			
40	Nick Bristow	Oct. 26, 2011, prescription for controlled substances			
41	Nick Bristow	Hydrocodone pills			
42	Nick Bristow	Hydrocodone pills			
43	Nick Bristow	Xanax pills			
44	Nick Bristow	Hydrocodone pills			
45	Nick Bristow	Xanax pills			
46	Nick Bristow	Lisinopril pills			
47	Nick Bristow	Pharmacy bags and receipts			
48	Nick Bristow	Recording of Dec. 8, 2011, undercover meeting			
49	Nick Bristow	Transcript of Exhibit 48			
50	Nick Bristow	Excerpts of Exhibit 48			
51	Nick Bristow	Dec. 8, 2011, Taylor clinic receipt			
52	Nick Bristow	Dec. 8, 2011, prescription for controlled substances			
53	Tanisha Washington	Recording of Sept. 23, 2011, undercover meeting			
54	Tanisha Washington	Transcript of Exhibit 53			
55	Tanisha Washington	Excerpts from Exhibit 53			
56	Tanisha Washington	Sept. 23, 2011, Taylor clinic receipt			
57	Tanisha Washington	Sept. 23, 2011, prescription for controlled substances			

58	Tanisha Washington	Recording of Oct. 26, 2011, undercover meeting at Taylor's clinic			
59	Tanisha Washington	Transcript of Exhibit 58			
60	Tanisha Washington	Excerpts from Exhibit 58			
61	Tanisha Washington	Oct. 26, 2011, prescription and clinic receipt for controlled substances			
62		RESERVED			
63		RESERVED			
64	Stipulation / Public Records Affidavit	Texas Medical Board records regarding Theodore W. Taylor			
65	Carol Hill	Recording of Dec. 8, 2011, undercover meeting			
66	Carol Hill	Transcript of Exhibit 65			
67	Carol Hill	Excerpts of Exhibit 65			
68	Carol Hill	Dec. 8, 2011, Taylor clinic receipt			
69	Carol Hill	Dec. 8, 2011, prescription for controlled substances			
70	Carol Hill	Recording of Jan. 11, 2012, undercover meeting			
71	Carol Hill	Transcript of Exhibit 70			
72	Carol Hill	Excerpts of Exhibit 70			
73	Carol Hill	Jan. 11, 2012, Taylor clinic receipt			
74	Carol Hill	Jan. 11, 2012, prescription for controlled substances			
75	Carol Hill	Money counter seized from Taylor clinic			
76	Carol Hill	Pre-signed prescriptions seized from Taylor clinic			
77	Carol Hill	DEA regulations governing prescribing controlled substances from Taylor clinic			
78	Carol Hill	Bank checks seized from Taylor clinic			
79	Alyssa Keith	Family photograph			
80	Chris Woolbright	Clinic bank records from Defendants' residence			
81	Chris Woolbright	Clinic bank records from Defendants' residence			
82	Chris Woolbright	Clinic records from Defendants' residence			
83	Chris Woolbright	Clinic records from Defendants' residence			
84	Chris Woolbright	Clinic records from Defendants' residence			
85	Chris Woolbright / Business Records Affidavit	Recording of Chia Jean Lee's visit to United Central Bank on Feb. 2, 2012			
86	Chris Woolbright	Excerpts of Exhibit 85			
87	Chris Woolbright	Recording of Chia Jean Lee's visit to United Central Bank on Feb. 3, 2012			
88	Chris Woolbright	Excerpts of Exhibit 87			
89	Chris Woolbright	Still photographs of Recording of Chia Jean Lee's visit to United Central Bank on Feb. 3, 2012			
90	Chris Woolbright / Business Records Affidavit	Defendants' safe deposit box lease at United Central Bank			
91	Joel Dunn	DEA Registration Voluntary Surrender form			
92	Joel Dunn	DEA Immediate Suspension form			
93	Joel Dunn	Documents provided to DEA during interview of Theodore W. Taylor on Feb. 2, 2011			

94	David Gardner	Summary chart of voluminous Taylor clinic Bookkeeping records			
95	David Gardner	Summary chart of voluminous Taylor clinic records			
96	David Gardner	Summary chart of voluminous Taylor clinic records			
97	David Gardner / Chris Woolbright	Financial records and deposit slips from Defendants' residence			
98	David Gardner	Financial records from Taylor clinic			
99	David Gardner	Clinic expansion plans from Taylor clinic			
100	David Gardner / Chris Woolbright	Financial records from Defendants' residence			
101	David Gardner	Financial records from Taylor clinic			
102	David Gardner	Summary chart of voluminous PMP records			
103	David Gardner	Summary chart of voluminous Taylor clinic records			
104	Chris Woolbright	Photographs taken at Defendants' residence on Feb. 2, 2011			
105	Carol Hill	Photographs taken at Taylor clinic on Feb. 2, 2011			
106	Susannah Herkert	Document from Taylor clinic			
107					
108					
109					
110					

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/ Stevan A. Buys

STEVAN A. BUYS

Assistant United States Attorney

Texas Bar No. 24033653

600 East Taylor, Suite 2000

Sherman, Texas 75090

Telephone: 903/868-9454

Facsimile: 903/892-2792

stevan.buys@usdoj.gov

JONATHAN R. HORNOK

Assistant United States Attorney

Utah State Bar No. 15166

500 North Stateline Avenue, Suite 402

Texarkana, Texas 75501

(903) 794-9481

(903) 792-5164 (fax)

Jonathan.Hornok@usdoj.gov

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was electronically filed *via* the District Court's Case Management/Electronic Case File system on September 24, 2018, from which all parties of record will receive an electronic copy thereof.

/s/ Stevan A. Buys

STEVAN A. BUYS